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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 4:21-cr-00019-RRB-SAO
)
Plaintiff,) <u>COUNT 1:</u>
) FELON IN POSSESSION OF A
vs.) FIREARM
) Vio. of 18 U.S.C. §§ 922(g)(1) and
JAY ALLEN JOHNSON) 924(a)(2)
)
Defendant.) <u>COUNT 2:</u>
) THREAT TO MURDER UNITED
) STATES OFFICIAL
) Vio. Of 18 U.S.C. § 115(a)(1)(B),
) (b)(4).
)
) <u>COUNT 3:</u>
) THREAT TO MURDER UNITED
) STATES OFFICIAL
) Vio. of 18 U.S.C. § 115(a)(1)(B),
) (b)(4).
)
)
)
)

) COUNT 4:
) THREAT TO DESTROY REAL
) PROPERTY BY FIRE
) Vio. of 18 U.S.C. § 844(e).
)
) COUNT 5:
) THREATENING INTERSTATE
) COMMUNICATION
) Vio. of 18 U.S.C. § 875(c).
)
) COUNT 6:
) THREATENING INTERSTATE
) COMMUNICATION
) Vio. of 18 U.S.C. § 875(c).
)
) CRIMINAL FORFEITURE
) ALLEGATION:
) Vio. of 18 U.S.C. § 924(d) and 28
) U.S.C. § 2461(c)
)
)

I N F O R M A T I O N

The United States Attorney charges that:

COUNT 1

On or about October 2, 2021 through October 4, 2021, within the District of Alaska, the defendant, JAY ALLEN JOHNSON, knowing he had previously been convicted by any court of the following crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, seven firearm, to wit:

1. One Columbian 9mm pistol;
2. One Smith & Wesson 38 Special pistol;

3. One Virginian Dragoon 44 Magnum revolver;
4. One Marlin 30 30 rifle;
5. One Smith & Wesson 41 Magnum revolver;
6. One Mossberg 835 12-gauge shotgun; and
7. One Taurus 9mm pistol.

Convictions

Conviction Date	Offense	Court	Case No
May 19, 2016	Felony DUI – 2+ Priors	State of Alaska	4DJ-14-00064CR

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT 2

On or about September 29, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, threatened to murder a United States Official, to wit: a United States Senator from Alaska (Senator 1), with intent to impede, intimidate, and interfere with such United States Official while engaged in the performance of official duties, and to retaliate against such United States Official on account of the performance of official duties.

All of which is in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

COUNT 3

On or about September 20 or 22, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, threatened to murder a United States Official, to wit: a United States Senator from Alaska (Senator 2), with intent to impede,

intimidate, and interfere with such United States Official while engaged in the performance of official duties, and to retaliate against such United States Official on account of the performance of official duties.

All of which is in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

COUNT 4

On or about September 2, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, through the use of a telephone and other instrument of interstate and foreign commerce, willfully made any threat to kill, injure, and intimidate any individual and unlawfully damage and destroy any building, vehicle, and other real and personal property, to wit: the real and personal properties of a United States Senator from Alaska (Senator 1), by means of fire.

All of which is in violation of 18 U.S.C. § 844(e).

COUNT 5

On or about September 29, 2021, within the District of Alaska and the District of Columbia, the defendant, JAY ALLEN JOHNSON, for the purpose of issuing a threat, knowingly transmitted in interstate and foreign commerce a communication containing any threat to injure the person of another, to wit: a United States Senator from Alaska (Senator 1).

All of which is in violation of 18 U.S.C. § 875(c).

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COUNT 6

On or about September 20, 21, 22, 2021, within the District of Alaska and the District of Columbia, the defendant, JAY ALLEN JOHNSON, for the purpose of issuing a threat, knowingly transmitted in interstate and foreign commerce a communication containing any threat to injure the person of another, to wit: a United States Senator from Alaska (Senator 2).

All of which is in violation of 18 U.S.C. § 875(c).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment is hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

Upon conviction of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), the defendant, JAY ALLEN JOHNSON, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in knowing violation of the offense, including, but not limited to the following:

1. One Columbian 9mm pistol;
2. One Smith and Wesson 38 Special pistol;
3. One Virginian Dragoon 44 Magnum revolver;
4. One Marlin 30 30 rifle;
5. One Smith and Wesson 41 Magnum revolver;
6. One Mossberg 835 12 gauge shotgun; and

7. One Taurus 9mm pistol.

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

E. BRYAN WILSON
Acting United States Attorney

s/ Ryan D. Tansey
RYAN D. TANSEY
Assistant United States Attorney
United States of America